

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Tayjon Maurice ROBERTSON

Case: 2:24-mj-30150

Case No. Assigned To : Unassigned

Assign. Date : 4/22/2024

USA V. SEALED MATTER (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

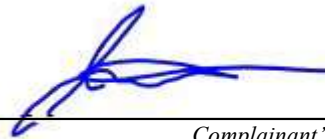
On or about the date(s) of June 23, 2023 in the county of Wayne and Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(a)(6)

Making a False Statement during the Acquisition of a Firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: April 22, 2024City and state: Detroit, Michigan*Complainant's signature*Special Agent Jimmie Pharr - ATF*Printed name and title**Judge's signature*Honorable Kimberly G. Altman, U.S. Magistrate Judge*Printed name and title*

## **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Jimmie Pharr, Special Agent for the Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, hereby depose and state as follows:

### **I. INTRODUCTION**

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since January 17, 2016. I am currently assigned to the Detroit Field Division. I completed twenty-six weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior. I was also employed as a Detroit Police Officer for the City of Detroit for approximately three years, 2013-2016. During my employment with the Detroit Police Department, I conducted and participated in numerous

criminal investigations focused on individuals who illegally possessed firearms and narcotics.

2. The facts in this affidavit come from my personal observations, training, experience, and information obtained from law enforcement officers and witnesses. I have not included every fact known to law enforcement concerning this investigation. I have only set forth the facts necessary to establish probable cause that Tayjon Maurice ROBERTSON violated 18 U.S.C. § 922(a)(6)—making a false statement during the acquisition of a firearm—on or around June 23, 2023.

## **II. PROBABLE CAUSE**

3. As part of its investigation of ROBERTSON for violations of federal firearm laws, ATF reviewed National Integrated Ballistic Information Network (“NIBIN”), Detroit Police, and E-Trace reports, and ATF Form 4473s associated with firearms believed to be purchased by ROBERTSON. These reports lead to the discovery of at least nine (9) different firearms purchased by ROBERTSON between November 2021 and May 2023. They are:

- One (1) Glock Pistol, model 48, purchased November 11, 2021, at Sportsman's Warehouse in Troy, MI. Law enforcement recovered this firearm during the arrest of another individual in May 2023.
- One (1) Glock Pistol, model 17, purchased on November 29, 2021, at Dunham's in Dearborn, MI.
- One (1) Glock Pistol, model 19, purchased on April 6, 2022, at Dunham's in Allen Park, MI.
- One (1) Glock Pistol, model 17, purchased on December 11, 2022, at Sportsman's Warehouse in Troy, MI. Law enforcement recovered this firearm from another individual in June 2023.
- One (1) Glock Pistol, model 21, purchased on June 22, 2022, at Dunham's in Allen Park, MI. Law enforcement recovered this firearm from another individual in February 2023
- One (1) Taurus Pistol, model G3, purchased on January 13, 2023, at Sportsman's Warehouse in Troy, MI.
- One (1) Glock Pistol, model 20, purchased on March 21, 2023, at Sportsman's Warehouse in Troy, MI.

- Two (2) Taurus Pistols, models G3C, purchased on May 12, 2023, at Sportsman's Warehouse in Troy, MI.

4. According to law enforcement record, ROBERTSON only registered one (1) firearm in the State of Michigan pistol registry. This suggests that ROBERTSON understands he must register pistols that he purchases for himself but failed to do so for almost all of the firearms he had purchased.

5. On June 28, 2023, ATF executed a federal search warrant at ROBERTSON's residence in Detroit, MI. Only one firearm—a Taurus Pistol, model G3, caliber 9mm, with one round in the chamber and no round in the magazine—were found. Also recovered from the residence, among others, are: two (2) pistol sales records for the purchase of a Glock 20 Pistol and a Micro Draco Pistol on June 23, 2023 from Uncoiled Firearms, an FFL located in Livonia, MI; and two (2) Pistol sales receipts for the purchase of a Glock 19 Pistol and a Glock 30 Pistol on June 23, 2023 from Dunham's Sports, an FFL located in Farmington Hills, MI.

6. During a post-Miranda interview on June 28, 2023, ROBERTSON admitted to purchasing firearms on June 23, 2023, on behalf of others in exchange for money.

7. During this interview, ROBERTSON also confirmed that he signed the “Firearms Transaction Record,” or ATF Forms 4473 when he purchased the firearms from Dunham’s Sport on June 23, 2023.

8. When an individual purchases a firearm from a federally licensed firearms dealer, he or she is required to complete an ATF Form 4473. Among other things, the form asks for the purchaser’s name, address, and other identifying information. It also requires the purchaser to verify that he or she is the actual intended purchaser of the firearm. Question 21.a. of Form 4473, “Are you the actual transferee/buyer of all of the firearm(s) listed on this form and any continuation sheet(s) (ATF Form 5300.9A)?” Purchasers must check a box “yes” or “no.” The question is then followed by the following admonition **“Warning: You are not the actual transferee/buyer if you are acquiring any of the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer any of the firearm(s) to you. Exception: If you are**

only picking up a repaired firearm(s) for another person, you are not required to answer 21.a. and may proceed to question 21.b.”

9. Dunham’s Sport in Farmington Hills is a federally licensed firearms dealer.

10. The ATF Forms 4473 completed in connection with the June 23, 2023 firearm purchases from Dunham’s Sport list ROBERTSON’s name, date of birth, and address. The name, date of birth, and address listed on the forms matches the name, date of birth, and address listed on ROBERTSON’s Michigan driver’s license. Additionally, each Form 4473 has the “yes” box checked for question 21.a.

11. Based on the above, there is probable cause to believe that ROBERTSON purchased firearms from federally licensed firearms dealers on June 23, 2023. There is further probable cause to believe that in doing so, ROBERTSON made materially false statements by indicating on the Form 4473 associated with each purchase that he was the actual transferee/buyer of each firearm, when in fact, he was buying the firearm on behalf of others.

### III. CONCLUSION

12. Probable cause exists that ROBERTSON violated 18 U.S.C. § 922(a)(6) – making a false statement during the acquisition of a firearm – by falsely indicating that he was the actual transferee/buyer on the ATF Form 4473s he completed in purchasing the firearms discussed above.

Respectfully submitted,



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Jimmie Pharr, Special Agent,  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



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HON. KIMBERLY G. ALTMAN  
UNITED STATES MAGISTRATE JUDGE

Dated: April 22, 2024